

### REMARKS

The above-identified patent application has been amended and reconsideration and reexamination is requested.

Applicant has amended the specification to correct typographic errors in the abstract as pointed out by the examiner.

Before discussing applicant's claims a brief discussion is in order. Rather than using an expensive apparatus to regroup items as exemplified by Markham, applicant provides an apparatus and method to verify that grouping was done correctly. The regrouping could have been accomplished manually or by an automated process. The verification system operates on an order, which was assembled either by an automated system or in most cases, manually assembled.

The examiner rejected claims 1-26 under 35 U.S.C. § 102 (b) as anticipated by Markham.

Claim 1 has been amended to recite that examining further comprises indicating to an operator if the scanned unique sequential identification does not correspond to an item that belongs in the group.

As amended, claim 1 is allowable over Markham. Markham is directed to grouping articles and not to verifying that grouped articles are in fact correctly grouped. As such, Markham neither describes nor suggests indicating to an operator if the scanned unique sequential identification does not correspond to an item that belongs in the group. There is no opportunity for Markham to determine if articles were correctly scanned since Markham is grouping articles not verifying the accuracy of grouped articles.

Claims 2-4 and 6-12 add further patentable features and are allowable at least for the reasons discussed in claim 1. Claim 6 for example recites indicating to an operator if the scanned unique sequential identification corresponds to an item that was already scanned and that belongs in the group. Markham has no such teaching nor would Markham suggest such a teaching since Markham is grouping articles and not verifying the grouping.

Claims 13-26 are patentable over Markham for at least the reasons discussed in claim 1 and corresponding dependent claims.

Applicant : Paul E. Massod  
Serial No. : 09/334,574  
Filed : June 21, 1999  
Page : 7

Attorney's Docket No.: 10925-002001

Applicant has added new claims 27-33, which claim additional features of the invention and are distinguishable over the art. Applicant has also reviewed the art of record and submits that it neither describes nor suggests the invention as now claimed.

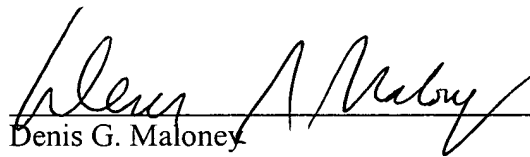
Attached is a marked-up version of the changes being made by the current amendment.

Applicant asks that all claims be allowed. Enclosed is a check for the Petition for Extension of Time fee and a check for Excess Claims added by amendment. Please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: \_\_\_\_\_

5/7/2001



Denis G. Maloney  
Reg. No. 29,670

Fish & Richardson P.C.  
225 Franklin Street  
Boston, MA 02110-2804  
Telephone: (617) 542-5070  
Facsimile: (617) 542-8906

RECEIVED  
MAY 17 2001  
TECHNICAL CENTER 2800



Version with markings to show changes made

In the specification:

Please replace the paragraph beginning at page 2, line 1 with the following rewritten paragraph:

Rather than using an expensive apparatus to regroup items this invention is directed to an apparatus and method to verify that grouping was done correctly, whether grouping was done manually or by an automated process. A large dry cleaning operation may have several people doing assembly. An automated grouping system could provide improvements in speed and accuracy and save on needed labor. For most dry cleaning operations this is not a great advantage. Most dry cleaning establishments are small having one or at most two people doing assembly. Therefore, the typical dry cleaner ~~has~~ would not save on labor with an automated grouping system.

In the claims:

Claims 5 and 17 have been cancelled.

Claim claim number (s) has been amended as follows:

1. (Amended) A method of inventory management comprises:  
verifying that [the] articles in a grouped order belong to the grouped order, wherein  
verifying further comprises:  
examining codes on tags associated with each article in the group to determine that the  
article belongs in the group with examining further comprising:  
indicating to an operator if the scanned unique sequential identification does not  
correspond to an item that belongs in the group.

8. (Amended) The method of claim 7 wherein if the first item has been determined, the  
method further comprises:

determining [the] a total number of articles in the group from the unique sequential identification of the first item.

9. (Amended) The method of claim [8] 1 wherein determining further comprises:  
subtracting a base number from a portion of the unique sequential identification to provide the number of items in the group.

13. (Amended) A computer program product residing on a computer readable media for use in a dry cleaning establishment comprises instructions for causing a computer to:

verify that articles in a grouped order belong in the grouped order, wherein instructions to verify further comprise instructions to:

examine codes on tags associated with each article in the group to determine that the article belongs in the group, with instructions to examine further comprising instructions to:  
indicate to an operator if the scanned unique sequential identification does not correspond to an item that belongs in the group.

20. (Amended) The computer program product of claim 19 wherein if the first item has been determined, the computer program product further comprises instructions to:

determine [the] a total number of articles in the group from the unique sequential identification of the first item.

24. (Amended) An apparatus for verifying inventory grouping comprises:

a scanner to scan codes on labels;

a computer having a computer readable storage media storing a computer program product comprises instructions for causing the computer to:

verify that articles in a grouped order belong in the grouped order, wherein instructions to verify further comprise instructions to:

examine codes on tags associated with each article in the group to determine that the article belongs in the group, with instructions to examine further comprising instructions to:

indicate to an operator if the scanned unique sequential identification does not correspond to an item that belongs in the group.

26. (Amended) The apparatus of claim 25 further comprising:  
a printer to print tags having unique sequential identifications for affixing to the articles and/or an ticket or invoice.

In the abstract:

An apparatus for verifying inventory grouping ~~comprises~~ includes a scanner to scan codes on labels, and a computer having a computer readable storage media storing a computer program product. The product includes instructions for causing the computer to verify that articles in a grouped order belong in the grouped order by examining codes on tags associated with each article in the group to determine that the article belongs in the group. Most dry cleaning establishments have built up over the years efficient ways to manually assemble garment articles into orders. This invention capitalizes on that investment. Rather than throwing away an established manual system to regroup, this invention establishes a verification system that can catch the infrequent but costly regrouping mistakes that occur.